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ROCKY FLATS PLANT, PO BOX 464, GOLDEN, COLORADO 80 102-0464 (303) 966 7000
April 3, 1991
91-RF-1637

R M Nelson, Jr Manager DOE, RFO

CESSATION OF ANALYSIS FOR POTENTIALLY DISSOLVED METALS (PDM) IN WATER SAMPLES

Attn John Rampe

Water samples from the RFP terminal ponds and surface water stations 001 (Woman Creek) and 003 (Walnut Creek at Indiana Street) are analyzed monthly for Total Metals (TM), Dissolved Metals (DM), and Potentially Dissolved Metals (PDM) Environmental Restoration (ER) staff recommend that the PDM analyses be discontinued because they are expensive and the information generated is of little value. The samples collected during March have been shipped, but are being held at the laboratory pending the decision to proceed with analysis

Environmental Monitoring and Assessment (EMAD) and Clean Water Act Divison (CWAD) both agree that this analysis is unnecessary for the following reasons:

- The analysis began at the request of Judy Bruch, Colorado Department of Health (CDH). Ms. Bruch maintained that the Colorado Water Quality Control Commission (CWQCC) proposed standards from the August 17, 1989, hearings were applicable to RFP waters. Review of the CWQCC hearing statements by CWAD has led to the determination that continuation of PDM analysis is not necessary because.
 - A. It is proposed for future use, and does not supersede site specific standards that incorporate a DM standard.
 - B. The CWQCC added the PDM proposal only to state-granted NPDES permits, not to stream discharge limits; it would not affect the RFP NPDES permit which is issued by EPA rather than the state.
 - C. It is intended to apply in cases where discharged waters enter those of a differing pH, which might induce a change in the dissolved metal content of the receiving stream. As RFP discharges do not enter flowing streams, this condition does not exist as a concern for RFP waters.
 - D If DM and PDM content can be shown to be statistically indistinguishable at the 95% confidence interval, the DM analysis will be used as the compliance method. Having taken paired samples for these parameters since July of 1990, sufficient data are already available to begin statistical evaluation. This will form the basis of a negotiating position should the question of DM vs. PDM compliance monitoring become an issue in the RFP NPDES permit.

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- With both DM and TM analyses performed, it is known that the PDM must fall between the two values. PDM provides information on the amount of dissolved metals added by the preservation method used in sampling. This is only of interest in cases where TDM limits are exceeded, and acidification of the sample is suspected of being a contributing factor.
- The additional cost of the PDM analysis is substantial (\$300 per sample, for a current monthly total of \$1200), and it also involves increased collection and shipping expenses to meet the specified holding time. Cessation of this analysis would release some of the laboratory budget for more relevant programs.
- 4 The specifications for PDM analysis are being incorporated into the EMAD GRRASP work-scope document. This ensures that should the information be required in the future, sampling and analysis can be reinstituted in a reasonable time frame with no revision to laboratory contracts being required.

Per verbal guidance from your staff that the analyses are not required by regulation, ER will cease further PDM sampling and analysis, and discard those samples collected but not yet analyzed for PDM.

If you have any questions regarding this analytical procedure or its definition and use, contact John Dick, extension 5950. Should any clarification of CWAD's assessment of the issues be desired, please contact Kitty Woldow at extension 6078.

M Kersh, Associate General Manager Environmental Restoration and Waste Management EG&G Rocky Flats, Inc.

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Orig and 1 cc - R M Nelson, Jr